

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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In the Matter Of)
Performance Measurements and Reporting)
Requirements For Operations Support)
Systems, Interconnection, and Operator)
Services and Directory Assistance)

CC Docket No. 98-56
RM-9101

EX PARTE PRESENTATION OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

I. INTRODUCTION

The Pennsylvania Public Utility Commission (PaPUC) respectfully submits this written *Ex Parte* Presentation commenting on the Performance Measurements and Reporting Requirements set forth in the FCC's Notice of Proposed Rulemaking at CC 98-56, which was released on April 17, 1998 at FCC Report Number CC 98-10. Pursuant to FCC regulations, two copies of this Presentation have been submitted to the FCC Office of the Secretary.

II . THE PENNSYLVANIA POSITION

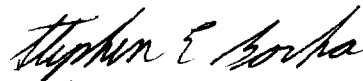
1. The PaPUC is dedicated to insuring that new entrants to the telecommunications market have equal access to Operations Support Systems (OSS). Thus, the PaPUC agrees that it is consistent with the public interest for the FCC to adopt

model OSS performance measurements and reporting guidelines which are non-binding upon the states. The PaPUC can use such standards as a guide when monitoring any discrimination by incumbent local exchange carriers (ILECs) against competitors and when enforcing state and FCC regulations against parties who do discriminate.

2. The PaPUC supports guidelines and standards which do not preclude states from developing different state guidelines and standards. Additionally, the states should retain the authority to establish penalties for various ILEC violations.

The Pennsylvania Public Utility Commission appreciates this opportunity to present comments on this matter, and will monitor the progress of this FCC docket.

Respectfully submitted,



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